



Jacquelyn Renee Moen
1047 South Mansfield Avenue
Los Angeles, CA. 90019
310.567.8006

Debtor In Pro Per

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - Los Angeles DIVISION

In re:)	Case No.: 2:19-bk-19038 BR
)	Adv. case no.2:20-ap-01660-BR
Jacquelyn Renee Moen,)	
)	Chapter 7
)	
)	ANSWER TO COMPLAINT TO:
Debtor.)	(1) EXCEPTION TO DISCHARGE
)	7USC SEC. 523(a)(2), (4)
)	AND (6) [FRAUDULENT
)	MISREPRESENTATIONS]
JUDITH MOEN,)	(2) EXEPTION TO DISCHARGE
)	7USC SEC.
Plaintiff(s),)	523(A)(2), (4) AND 6
)	[FRAUDULENT
)	CONCEALMENT]
)	(3) EXCEPTION TO DISCHARGE
V.)	7USC SEC.
)	523(a)(4) [BREACH OF
)	FIDUCIARY DUTIES]
JACQUELYN RENEE MOEN, an)	(4) EXCEPTION TO DISCHARGE
individual)	7USC SEC. 523(a)(2)(4)
)	AND (6) [VIOLATION OF
)	BUSINESS & PROFESSIONAL
Defendant(s).)	CODE SEC. 6152]
)	(5) EXCEPTION TO DISCHARGE
)	7USC SEC.
)	523(a)(2), (4) AND (6)
)	[VIOLATIONS OF RULES OF
)	PROFESSIONAL CONDUCT,
)	RULE 1-400 (B)(C)
)	(6) EXCEPTIONN TO DISCHARGE
)	7USC SEC. 523(a)(2), (4)
)	AND (6) [VIOLATION OF
)	BUSINESS AND
)	PROFESSIONAL CODE SEC.
)	6148]
)	(7) EXCEPTION TO DISCHARGE
)	7USC SEC 523(a)(2), (4)
)	AND (6) [VIOLATION OF
)	BUSINESS AND
)	PROFESSIONAL CODE, SEC
)	17200]
)	(8) DENY DISCHARGE OF THE
)	DEBTOR 7 SEC. 727(a)(4)

[illegible]

8 COMES NOW JACQUELYN RENEE MOEN, ("Defendant"), and
9 hereby files her answer to the Complaint on file, and hereby
10 admits, denies and alleges as follows:

11 1. Answering the allegations contained in paragraph 1 of
12 the Complaint herein, Defendant lacks sufficient information and
13 belief to admit or deny the allegations contained therein, and
14 therefore denies each and every allegation contained therein.

2. Answering the allegations contained in paragraph 2 of the Complaint herein, Defendant lacks sufficient information and belief to admit or deny the allegations contained therein, and therefore denies each and every allegation contained therein.

19 3. Answering the allegations contained in paragraph 3 of
20 the Complaint herein, Defendant lacks sufficient information and
21 belief to admit or deny the allegations contained therein, and
22 therefore denies each and every allegation contained therein.

23 4. Answering the allegations contained in paragraph 4 of
24 the Complaint herein, Defendant lacks sufficient information and
25 belief to admit or deny the allegations contained therein, and
26 therefore denies each and every allegation contained therein. (I
27 have not spoken to Judith Moen-Stanley, nor any members of her
family since 2010/it has been well over ten years).

28 | 5. Answering the allegations contained in paragraph 5 of

1 the Complaint herein, Defendant admits each and every allegation
2 contained therein.

3 6. Answering the allegations contained in paragraph 6 of
4 the Complaint herein, Defendant admits each and every allegation
5 contained therein.

6 7. Answering the allegations contained in paragraph 7 of
7 the Complaint herein, Defendant admits each and every allegation
8 contained therein.

9 8. Answering the allegations contained in the paragraph
10 8 of the complaint herein, defendant lacks sufficient
11 information and belief to admit or deny allegations contained
12 therein, and therefore denies each and every allegation
13 contained therein.

14 9. Answering the allegations contained in paragraph 9 of
15 the Complaint herein, Defendant admits each and every allegation
16 contained therein.

17 10. Answering the allegations contained in the paragraph
18 10 of the complaint herein, defendant lacks sufficient
19 information and belief to admit or deny allegations contained
20 therein, and therefore denies each and every allegation
21 contained therein.

22 11. Answering the allegations contained in the paragraph
23 11 of the complaint herein, defendant lacks sufficient
24 information and belief to admit or deny allegations contained
25 therein, and therefore denies each and every allegation
26 contained therein.

27 12. Answering the allegations contained in paragraph 12 of
28 the Complaint herein, Defendant admits each and every allegation

1 contained therein.

2 13. Answering the allegations contained in the paragraph
3 13 of the complaint herein, defendant lacks sufficient
4 information and belief to admit or deny allegations contained
5 therein, and therefore denies each and every allegation
6 contained therein.

7 14. Answering the allegations contained in the paragraph
8 14 of the complaint herein, defendant lacks sufficient
9 information and belief to admit or deny allegations contained
10 therein, and therefore denies each and every allegation
11 contained therein.

12 15. Answering the allegations contained in the paragraph
13 15 of the complaint herein, defendant lacks sufficient
14 information and belief to admit or deny allegations contained
15 therein, and therefore denies each and every allegation
16 contained therein.

17 16. Answering the allegations contained in the paragraph
18 16 of the complaint herein, defendant lacks sufficient
19 information and belief to admit or deny allegations contained
20 therein, and therefore denies each and every allegation
21 contained therein.

22 17. Answering the allegations contained in the paragraph
23 17 of the complaint herein, defendant lacks sufficient
24 information and belief to admit or deny allegations contained
25 therein, and therefore denies each and every allegation
26 contained therein.

27 18. Answering the allegations contained in the paragraph
28 18 of the complaint herein, defendant lacks sufficient

1 information and belief to admit or deny allegations contained
2 therein, and therefore denies each and every allegation
3 contained therein.

4 19. Answering the allegations contained in the paragraph
5 19 of the complaint herein, defendant lacks sufficient
6 information and belief to admit or deny allegations contained
7 therein, and therefore denies each and every allegation
8 contained therein.

9 20. Answering the allegations contained in the paragraph
10 20 of the complaint herein, defendant lacks sufficient
11 information and belief to admit or deny allegations contained
12 therein, and therefore denies each and every allegation
13 contained therein.

14 21. Answering the allegations contained in the paragraph
15 21 of the complaint herein, defendant lacks sufficient
16 information and belief to admit or deny allegations contained
17 therein, and therefore denies each and every allegation.
18 contained therein.

19 22. Answering the allegations contained in the paragraph
20 22 of the complaint herein, defendant lacks sufficient
21 information and belief to admit or deny allegations contained
22 therein, and therefore denies each and every allegation
23 contained therein.

24 23. Answering the allegations contained in the paragraph
25 23 of the complaint herein, defendant lacks sufficient
26 information and belief to admit or deny allegations contained
27 therein, and therefore denies each and every allegation
28 contained therein.

1 24. Answering the allegations contained in the paragraph
2 24 of the complaint herein, defendant lacks sufficient
3 information and belief to admit or deny allegations contained
4 therein, and therefore denies each and every allegation
5 contained therein.

6 25. Answering the allegations contained in paragraph 25 of
7 the Complaint herein, Defendant denies each and every allegation
8 contained therein.

9 26. Answering the allegations contained in paragraph 26 of
10 the Complaint herein, Defendant denies each and every allegation
11 contained therein.

12 27. Answering the allegations contained in paragraph 27 of
13 the Complaint herein, Defendant denies each and every allegation
14 contained therein.

15 28. Answering the allegations contained in paragraph 28 of
16 the Complaint herein, Defendant denies each and every allegation
17 contained therein.

18 29. Answering the allegations contained in paragraph 29 of
19 the Complaint herein, Defendant denies each and every allegation
20 contained therein.

21 30. Defendant repeats and realleges the responses to the
22 allegations contained in paragraphs 1 through 29 of this Answer
23 to the Complaint, and incorporates the same by reference as
24 though set forth in full herein.

25 31. Answering the allegations contained in paragraph 31 of
26 the Complaint herein, Defendant denies each and every allegation
27 contained therein.

28 32. Answering the allegations contained in paragraph 32 of

1 the Complaint herein, Defendant denies each and every allegation
2 contained therein.

3 33. Answering the allegations contained in paragraph 33 of
4 the Complaint herein, Defendant denies each and every allegation
5 contained therein.

6 34. Answering the allegations contained in paragraph 34 of
7 the Complaint herein, Defendant denies each and every allegation
8 contained therein.

9 35. Answering the allegations contained in paragraph 35 of
10 the Complaint herein, Defendant denies each and every allegation
11 contained therein.

12 36. Answering the allegations contained in paragraph 36 of
13 the Complaint herein, Defendant denies each and every allegation
14 contained therein.

15 37. Answering the allegations contained in the paragraph
16 37 of the complaint herein, defendant lacks sufficient
17 information and belief to admit or deny allegations contained
18 therein, and therefore denies each and every allegation
19 contained therein.

20 38. Answering the allegations contained in the paragraph
21 38 of the complaint herein, defendant lacks sufficient
22 information and belief to admit or deny allegations contained
23 therein, and therefore denies each and every allegation
24 contained therein.

25 39. Answering the allegations contained in paragraph 39 of
26 the Complaint herein, Defendant denies each and every allegation
27 contained therein.

28 40. Answering the allegations contained in paragraph 40 of

1 the Complaint herein, Defendant denies each and every allegation
2 contained therein.

3 41. Defendant repeats and realleges the responses to the
4 allegations contained in paragraphs 1 through 40 of this Answer
5 to the Complaint, and incorporates the same by reference as
6 though set forth in full herein.

7 42. Answering the allegations contained in the paragraph
8 42 of the complaint herein, defendant lacks sufficient
9 information and belief to admit or deny allegations contained
10 therein, and therefore denies each and every allegation
11 contained therein.

12 43. Answering the allegations contained in the paragraph
13 43 of the complaint herein, defendant lacks sufficient
14 information and belief to admit or deny allegations contained
15 therein, and therefore denies each and every allegation
16 contained therein.

17 44. Answering the allegations contained in the paragraph
18 44 of the complaint herein, defendant lacks sufficient
19 information and belief to admit or deny allegations contained
20 therein, and therefore denies each and every allegation
21 contained therein.

22 45. Answering the allegations contained in the paragraph
23 45 of the complaint herein, defendant lacks sufficient
24 information and belief to admit or deny allegations contained
25 therein, and therefore denies each and every allegation
26 contained therein.

27 46. Answering the allegations contained in paragraph 46 of
28 the Complaint herein, Defendant denies each and every allegation

1 contained therein.

2 47. Answering the allegations contained in paragraph 47 of
3 the Complaint herein, Defendant denies each and every allegation
4 contained therein.

5 48. Answering the allegations contained in paragraph 48 of
6 the Complaint herein, Defendant denies each and every allegation
7 contained therein.

8 49. Answering the allegations contained in paragraph 49 of
9 the Complaint herein, Defendant denies each and every allegation
10 contained therein.

11 50. Defendant repeats and realleges the responses to the
12 allegations contained in paragraphs 1 through 49 of this Answer
13 to the Complaint, and incorporates the same by reference as
14 though set forth in full herein.

15 51. Answering the allegations contained in the paragraph
16 51 of the complaint herein, defendant lacks sufficient
17 information and belief to admit or deny allegations contained
18 therein, and therefore denies each and every allegation
19 contained therein.

20 52. Answering the allegations contained in the paragraph
21 51 of the complaint herein, defendant lacks sufficient
22 information and belief to admit or deny allegations contained
23 therein, and therefore denies each and every allegation
24 contained therein.

25 53. Answering the allegations contained in paragraph 53 of
26 the Complaint herein, Defendant denies each and every allegation
27 contained therein.

28 54. Answering the allegations contained in paragraph 54 of

1 the Complaint herein, Defendant denies each and every allegation
2 contained therein.

3 55. Answering the allegations contained in paragraph 55 of
4 the Complaint herein, Defendant denies each and every allegation
5 contained therein.

6 56. Answering the allegations contained in paragraph 56 of
7 the Complaint herein, Defendant denies each and every allegation
8 contained therein.

9 57. Answering the allegations contained in paragraph 57 of
10 the Complaint herein, Defendant denies each and every allegation
11 contained therein.

12 58. Answering the allegations contained in paragraph 58 of
13 the Complaint herein, Defendant denies each and every allegation
14 contained therein.

15 59. Defendant repeats and realleges the responses to the
16 allegations contained in paragraphs 1 through 58 of this Answer
17 to the Complaint, and incorporates the same by reference as
18 though set forth in full herein.

19 60. Answering the allegations contained in paragraph 60 of
20 the Complaint herein, Defendant denies each and every allegation
21 contained therein.

22 61. Answering the allegations contained in paragraph 61 of
23 the Complaint herein, Defendant denies each and every allegation
24 contained therein.

25 62. Answering the allegations contained in paragraph 62 of
26 the Complaint herein, Defendant denies each and every allegation
27 contained therein.

28 63. Answering the allegations contained in paragraph 63 of

1 the Complaint herein, Defendant denies each and every allegation
2 contained therein.

3 64. Answering the allegations contained in paragraph 64 of
4 the Complaint herein, Defendant denies each and every allegation
5 contained therein.

6 65. Answering the allegations contained in paragraph 65 of
7 the Complaint herein, Defendant denies each and every allegation
8 contained therein.

9
10
11 AS A FIRST SEPARATE AFFIRMATIVE DEFENSE

12 (Failure to State a Cause of Action)

13 As a First Affirmative defense, Defendant alleges the Complaint
14 failed to state facts sufficient to constitute a cause of action
15 against this answering Defendant.

16 AS A SECOND SEPARATE AFFIRMATIVE DEFENSE

17 (Contributory Negligence)

18 As a Second Affirmative defense, Defendant alleges the
19 Plaintiff's alleged loss or damage was caused, in whole or in part, by
20 the carelessness and negligence of Plaintiff or its agents, and
21 Plaintiffs should therefore recover nothing from Defendant, or any
22 recovery otherwise due from Defendant should be reduced to reflect the
23 percentage to which the fault and negligence of Plaintiff or its
24 agents caused and contributed to the injuries or damages claimed to
25 have been suffered.

26 AS A THIRD SEPARATE AFFIRMATIVE DEFENSE

27 (Acts of Third Parties)
28

1 As a Third Affirmative defense, Defendant alleges if Plaintiff
2 suffered damage or loss as alleged, such damage and loss was caused in
3 whole or in part by the acts of persons other than the Defendant, for
4 whom the Defendant is not responsible.

5
6 AS A FOURTH SEPARATE AFFIRMATIVE DEFENSE

7 (Duress)

8 As a Fourth Affirmative defense, Defendant alleges duress.

9
10 AS A FIFTH SEPARATE AFFIRMATIVE DEFENSE

11 (Failure to Mitigate Damages)

12 As a Fifth Affirmative defense, Defendant alleges Plaintiff has
13 failed to reasonably mitigate its alleged damages, if any.

14
15 AS A SIXTH SEPARATE AFFIRMATIVE DEFENSE

16 (Estoppel)

17 As a Sixth Affirmative defense, Defendant alleges Plaintiff's
18 claims are barred by the doctrine of estoppel.

19
20 AS A SEVENTH SEPARATE AFFIRMATIVE DEFENSE

21 (Laches)

22 As a Seventh Affirmative defense, Defendant alleges Plaintiff,
23 because of its conduct, is barred under the doctrine of laches from
24 recovery on its Complaint or on any cause of action contained in the
25 Complaint in which Plaintiff caused unreasonable delay in filing his
26 claim by 1 year and 8 months, then asking interest for that time.
27
28

1 AS A EIGHTH SEPARATE AFFIRMATIVE DEFENSE

2 (Intervening and Superseding Acts)

3 As a Eighth Affirmative defense, Defendant alleges the damages or
4 losses alleged sustained by Plaintiff, if any, were the direct and
5 proximate result of intervening and superseding actions on the part of
6 other parties, and not Defendant, barring Plaintiff's recovery from
7 Defendant.

8 AS A NINTH SEPARATE AFFIRMATIVE DEFENSE

9 (Justifiable Reliance)

10 As a Ninth Affirmative defense, Defendant alleges any
11 representation or other act by Defendant on which Plaintiff bases its
12 claims was made by Defendant in justifiable reliance on the actions
13 and representations on others, and Plaintiff must look to those
14 parties instead of to Defendant for recovery, if any.

15 AS A TENTH SEPARATE AFFIRMATIVE DEFENSE

16 (Plaintiff's Knowledge)

17 As a Tenth Affirmative defense, Defendant alleges Plaintiff's
18 claims are barred by their actual or constructive knowledge or
19 acceptance of the facts on which they base their claims against
20 Defendant.
21

22 AS A ELEVENTH SEPARATE AFFIRMATIVE DEFENSE

23 (Justification)

24 As a Eleventh Affirmative defense, Defendant alleges that all
25 acts done by Defendant were performed fairly, in good faith and for a
26 lawful purpose, and were reasonable and justified under the
27 circumstances.
28

1 AS A TWELFTH SEPARATE AFFIRMATIVE DEFENSE

2 (Plaintiff's Inequitable Conduct)

3 As a Twelfth Affirmative defense, Defendant alleges that
4 Plaintiff is guilty of inequitable conduct in relation to the
5 instrument which they seek to rescind, and if they are granted relief,
6 it should be only on the condition that they do equity in Defendant's
7 favor.

8 AS A THIRTEENTH SEPARATE AFFIRMATIVE DEFENSE

9 (Setoff)

10 As a Thirteenth Affirmative defense, Defendant alleges
11 Plaintiff's claims are bared, or any restitution required to be
12 reduced, by setoff due to Plaintiff's failure to abide by their legal
13 obligations to Defendant.

14 AS A FOURTEENTH SEPARATE AFFIRMATIVE DEFENSE

15 (Void or Voidable Contract)

16 As a Fourteenth Affirmative defense, Defendant alleges that
17 Plaintiff's claims are unenforceable and/or void as a result of
18 Plaintiff's lack of capacity to contract.

19
20 AS A FIFTEENTH SEPARATE AFFIRMATIVE DEFENSE

21 (Fraud)

22 As a Fifteenth Affirmative defense, Defendant alleges Plaintiff's
23 claims are barred by the provisions of California Civil Procedure
24 (C.C.P.) §338, action based on fraud, with respect to the alleged
25 damages suffered by Plaintiff.

AS A SIXTEENTH SEPARATE AFFIRMATIVE DEFENSE

(Accord and Satisfaction)

As a Sixteenth Affirmative defense, Defendant alleges Plaintiff's claims are barred by Accord and Satisfaction.

AS A SEVENTEENTH SEPARATE AFFIRMATIVE DEFENSE

(Usury)

As a Seventeenth Affirmative defense, Defendant alleges Plaintiff is demanding excessive interest and damages by way of its Complaint.

AS A EIGHTEENTH SEPARATE AFFIRMATIVE DEFENSE

(Improper Notice of Breach)

As an Eighteenth Affirmative defense, Defendant alleges Plaintiff's claims are barred by Plaintiff's failure notify Defendant he was in breach of contract.

AS A NINETEENTH SEPARATE AFFIRMATIVE DEFENSE

(Mitigation of Damages)

As a Nineteenth Affirmative defense, Defendant alleges Plaintiff is not entitled to recover damages for harm that could have been avoided with reasonable efforts.

AS A TWENTIETH SEPARATE AFFIRMATIVE DEFENSE

(Unclean Hands)

As a Twentieth Affirmative defense, Defendant alleges Plaintiff is not entitled to relief on account that Plaintiff is acting unethically has acted in bad faith with respect to its Complaint.

WHEREFORE, Defendant prays:

1. That Plaintiff take nothing by way of this Complaint;
2. That the within Complaint be dismissed;

3. For costs and attorney fees that may be incurred; and
4. For such other and different relief as may be just.

Dated: December 3, 2020

By: 
Jacquelyn Renee Moen
Debtor In Pro Per